

## EXHIBIT 362

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

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IN RE: NATIONAL	) MDL No. 2804
PRESCRIPTION OPIATE	)
LITIGATION	) Case No.
-----	) 1:17-MD-2804
	)
THIS DOCUMENT RELATES TO	) Hon. Dan A. Polster
ALL CASES	)
-----	)

HIGHLY CONFIDENTIAL  
SUBJECT TO FURTHER CONFIDENTIALITY REVIEW

VIDEOTAPED DEPOSITION OF

TASHA POLSTER

January 23, 2019

Chicago, Illinois

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Page 2	Page 4
<p>1 2 3 4 5 The videotaped deposition of TASHA POLSTER, 6 called by the Plaintiffs for examination, taken 7 pursuant to the Federal Rules of Civil Procedure of 8 the United States District Courts pertaining to the 9 taking of depositions, taken before CORINNE T. 10 MARUT, C.S.R. No. 84-1968, Registered Professional 11 Reporter and a Certified Shorthand Reporter of the 12 State of Illinois, at the offices of Bartlit Beck 13 LLP, Suite 600, 54 West Hubbard Street, Chicago, 14 Illinois, on January 23, 2019, commencing at 9:16 15 a.m. 16 17 18 19 20 21 22 23 24</p>	<p>1 APPEARANCES (Continued): 2 ON BEHALF OF JOHNSON &amp; JOHNSON, 3 JANSSEN PHARMACEUTICALS, INC., 4 ORTHO-McNEIL-JANSSEN PHARMACEUTICALS, INC. 5 n/k/a JANSSEN PHARMACEUTICALS, INC.; 6 JANSSEN PHARMACEUTICA, INC. n/k/a JANSSEN 7 PHARMACEUTICALS, INC.: 8 9 TUCKER ELLIS LLP 10 950 Main Avenue, Suite 1100 11 Cleveland, Ohio 44113-7213 12 216-696-3950 13 BY: SAVANNAH M. FOX, ESQ. 14 s.fox@tuckerellis.com 15 (via telephone/livestream) 16 17 ON BEHALF OF ENDO HEALTH SOLUTIONS INC. and 18 ENDO PHARMACEUTICALS, INC., 19 PAR PHARMACEUTICAL, INC., and PAR PHARMACEUTICAL 20 COMPANIES, INC. (f/k/a Par Pharmaceutical 21 Holdings, Inc.): 22 ARNOLD &amp; PORTER KAYE SCHOLER LLP 23 601 Massachusetts Avenue, NW 24 Washington, DC 20001-3743 202-942-5000 BY: RYAN Z. WATTS, ESQ. ryan.watts@arnoldporter.com ON BEHALF OF McKESSON CORPORATION: TABET DIVITO &amp; ROTHSTEIN LLC 209 South LaSalle Street, 7th Floor Chicago, Illinois 60604 312-762-9461 BY: DANIEL L. STANNER, ESQ. dstanner@tdrlawfirm.com KYLE A. COOPER, ESQ. kcooper@tdrlawfirm.com</p>
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<p style="text-align: right;">Page 142</p> <p>1 BY MR. MOUGEY:</p> <p>2 Q. I'm sure it did. So, under "Cardinal</p> <p>3 SOM," that stands for suspicious order monitoring,</p> <p>4 correct?</p> <p>5 MS. FIX MEYER: Object to form.</p> <p>6 BY THE WITNESS:</p> <p>7 A. Yes.</p> <p>8 BY MR. MOUGEY:</p> <p>9 Q. On the third bullet down, "About 60% of</p> <p>10 these orders are legitimate orders that should be</p> <p>11 canceled."</p> <p>12 The last sentence says, "These are</p> <p>13 stores who are over their corporate ceiling." And</p> <p>14 corporate ceiling is Walgreens' corporate ceiling,</p> <p>15 correct?</p> <p>16 A. Yes.</p> <p>17 Q. Means that they weren't allowed to order</p> <p>18 any more, correct?</p> <p>19 A. Without proper documentation, yes.</p> <p>20 Q. And -- but "they are going to Cardinal</p> <p>21 to request the product."</p> <p>22 Do you see that?</p> <p>23 A. Yep.</p> <p>24 MS. FIX MEYER: Objection to form.</p>	<p style="text-align: right;">Page 144</p> <p>1 telling you the truth. I mean, you got to take</p> <p>2 care of the patients. And so --</p> <p>3 BY MR. MOUGEY:</p> <p>4 Q. The question I asked you was simple.</p> <p>5 Does the store have the ability to go to</p> <p>6 another vendor and order controlled substances</p> <p>7 after they hit the ceiling at Walgreens?</p> <p>8 MR. HOUTZ: Next time please let her finish</p> <p>9 her answer before you interrupt.</p> <p>10 MR. MOUGEY: The next time I'd like to have an</p> <p>11 answer to the question that I asked.</p> <p>12 BY MR. MOUGEY:</p> <p>13 Q. The vendors --</p> <p>14 MR. HOUTZ: If you allow her to finish your</p> <p>15 answer, you may get an answer.</p> <p>16 BY MR. MOUGEY:</p> <p>17 Q. The vendors -- I'm sorry.</p> <p>18 The pharmacies are allowed to order</p> <p>19 additional controlled substance, highly addictive,</p> <p>20 like OxyContin that we talked about earlier, once</p> <p>21 they hit the ceiling, that store can go to Cardinal</p> <p>22 and order additional oxycodone, correct?</p> <p>23 MS. FIX MEYER: Objection; form, foundation.</p> <p>24 MR. HOUTZ: Same objection.</p>
<p style="text-align: right;">Page 143</p> <p>1 BY MR. MOUGEY:</p> <p>2 Q. So, Walgreens' system, if a store</p> <p>3 exceeded the ceiling, they were told no more</p> <p>4 Schedule II or Schedule III controlled substances</p> <p>5 from us, correct, Walgreens?</p> <p>6 A. They didn't know. So --</p> <p>7 Q. They knew they couldn't order any more,</p> <p>8 correct?</p> <p>9 A. They wouldn't know because -- they</p> <p>10 wouldn't know until the order was due to show up.</p> <p>11 Q. And it didn't show up and they knew they</p> <p>12 didn't get it, correct?</p> <p>13 A. Right, but they didn't know why.</p> <p>14 Q. So, they knew they didn't get the order</p> <p>15 from Walgreens, correct?</p> <p>16 A. Correct.</p> <p>17 Q. And they didn't know why, but they</p> <p>18 didn't get it from Walgreens but then Walgreens</p> <p>19 allowed up until a period in time for that store to</p> <p>20 put it in an order from another vendor, correct?</p> <p>21 MR. HOUTZ: Object to form and foundation.</p> <p>22 BY THE WITNESS:</p> <p>23 A. Walgreens -- any pharmacy has secondary</p> <p>24 wholesalers if the one wholesaler -- I'm just</p>	<p style="text-align: right;">Page 145</p> <p>1 BY MR. MOUGEY:</p> <p>2 Q. Yes or no.</p> <p>3 A. I'm not going to yes or no answer that.</p> <p>4 I'm going to tell you what happened.</p> <p>5 Q. No, I want to know if they have the</p> <p>6 ability. That's all I asked.</p> <p>7 A. Yes.</p> <p>8 Q. Do they have the ability to order --</p> <p>9 A. Yes.</p> <p>10 Q. -- more oxycodone from another vendor</p> <p>11 like Cardinal after Walgreens' ceiling has been</p> <p>12 hit?</p> <p>13 MS. FIX MEYER: Objection; form, foundation.</p> <p>14 BY THE WITNESS:</p> <p>15 A. On this date, yes.</p> <p>16 BY MR. MOUGEY:</p> <p>17 Q. Yes. Thank you.</p> <p>18 MR. MOUGEY: Les, if it's okay with you, it's</p> <p>19 a good stopping point for me for lunch.</p> <p>20 MR. HOUTZ: Sure.</p> <p>21 MR. MOUGEY: I am planning on using the seven</p> <p>22 hours today. So, I just want to give everybody a</p> <p>23 heads-up as we go through. I'm happy to take a</p> <p>24 shorter or longer lunch as you and Ms. Polster</p>

<p style="text-align: right;">Page 154</p> <p>1 A. You mean not shipped?</p> <p>2 Q. Yes, ma'am.</p> <p>3 A. What about it?</p> <p>4 Q. That's pre-you, though, wasn't it?</p> <p>5 A. Yes.</p> <p>6 Q. Yes. When you got there, if an order</p> <p>7 was flagged by the Bancroft algorithm, it was -- is</p> <p>8 the word "cut"? Are you okay with that? Or what's</p> <p>9 the right terminology you'd use?</p> <p>10 A. It was not shipped at all.</p> <p>11 Q. Not shipped?</p> <p>12 A. Right.</p> <p>13 Q. But the store was allowed to order up to</p> <p>14 that threshold, correct? They had to enter a new</p> <p>15 order in?</p> <p>16 A. Yes.</p> <p>17 Q. So, it was not shipped, but then the</p> <p>18 store could reenter an order up to the ceiling</p> <p>19 level, correct?</p> <p>20 A. Yes, but the store didn't have</p> <p>21 visibility into that ceiling level.</p> <p>22 Q. I understand.</p> <p>23 A. Okay.</p> <p>24 Q. I understand that's your drumbeat.</p>	<p style="text-align: right;">Page 156</p> <p>1 made based on that new information.</p> <p>2 Q. So, as you learned more and as you got</p> <p>3 up to speed, there were a different -- there were</p> <p>4 additional controls that needed to be implemented?</p> <p>5 A. There were -- there were changes that</p> <p>6 needed to be made, yes.</p> <p>7 Q. All right. And it didn't all happen at</p> <p>8 once --</p> <p>9 A. Right.</p> <p>10 Q. -- is what you're saying. It was over a</p> <p>11 period of time?</p> <p>12 A. Right.</p> <p>13 Q. And when -- and I'm trying not to use --</p> <p>14 I'm trying to use the word you feel comfortable</p> <p>15 with. Is control, an additional control? What</p> <p>16 term would you use?</p> <p>17 You didn't like the modification to the</p> <p>18 algorithm. So, I'm trying to find a word you're</p> <p>19 comfortable with.</p> <p>20 A. Yeah, controls, that's fine.</p> <p>21 Q. Is control okay?</p> <p>22 A. Yeah.</p> <p>23 Q. That there were issues that your team</p> <p>24 was identifying along the way, they were trying to</p>
<p style="text-align: right;">Page 155</p> <p>1 A. Yeah.</p> <p>2 Q. But right now if the order wasn't</p> <p>3 shipped, they were allowed to ship up to that</p> <p>4 ceiling level, correct?</p> <p>5 A. Sure.</p> <p>6 Q. Okay. Now, your team knew that there</p> <p>7 were modifications that needed to be made to the</p> <p>8 Bancroft algorithm, correct?</p> <p>9 Actually, you corrected me before about</p> <p>10 the Bancroft. Let's use your language, whatever</p> <p>11 you feel comfortable with.</p> <p>12 So, rather than me saying changing the</p> <p>13 algorithm, how about your team was aware that there</p> <p>14 were -- that controls were needed to ensure that</p> <p>15 all orders were going through the Walgreens</p> <p>16 suspicious order monitoring system?</p> <p>17 MR. HOUTZ: Object to form.</p> <p>18 BY THE WITNESS:</p> <p>19 A. I don't agree when you say they were</p> <p>20 aware.</p> <p>21 BY MR. MOUGEY:</p> <p>22 Q. Okay.</p> <p>23 A. I think as time progressed, things would</p> <p>24 pop up and then we would ask for a change to be</p>	<p style="text-align: right;">Page 157</p> <p>1 find solutions and then implementing a control to</p> <p>2 kind of close --</p> <p>3 A. The goal was to have consistency on how</p> <p>4 the stores would order; and as things popped up</p> <p>5 that created confusion for patient care and was</p> <p>6 happening at store level, then we made adjustments</p> <p>7 along the way to, you know, decrease any type of</p> <p>8 confusion a store would have in getting a product.</p> <p>9 Q. Would you feel comfortable with the word</p> <p>10 that when Pharmaceutical Integrity started, that</p> <p>11 there were loopholes in the system that needed to</p> <p>12 be closed with additional controls to ensure</p> <p>13 compliance with Walgreens' duties as a distributor?</p> <p>14 A. Those -- I think there were gaps. I</p> <p>15 don't know about loopholes.</p> <p>16 Q. Let's use the word "gaps." I'm</p> <p>17 comfortable with "gaps."</p> <p>18 A. Okay.</p> <p>19 Q. So, there were gaps in Walgreens'</p> <p>20 policies and procedures with its distribution of</p> <p>21 controlled substances that your team was</p> <p>22 identifying and addressing throughout '13 and early</p> <p>23 '14?</p> <p>24 A. Yes.</p>